September 17, 2013

Clerk of the Board
California Air Resources Board
1001 | Street
Sacramento, CA 95912

via web portal - http://www.arb.ca.gov/lispub/comm/bclist.php

Subject: Proposed Amendments to the Antiperspirants and Deodorants Rule and the Consumer Products Regulations

## Clerk of the Board:

Honeywell appreciates the opportunity to comment on the Amendments to the Antiperspirants and Deodorants regulation and Consumer Products regulation. These amendments are to be heard by the California Air Resources Board on September 26, 2013.

Honeywell (<u>www.honeywell.com</u>) is a Fortune 100 diversified technology and manufacturing leader, serving customers worldwide with aerospace products and services; control technologies for buildings, homes and industry; turbochargers; and performance materials. Honeywell is based in Morris Township, N.J.

Honeywell supports the inclusion of the HFO-1234ze compound into the definition for VOC, as an exempt VOC compound for both the Antiperspirants and Deodorants Regulation and the Consumer Products Regulation. The US EPA has exempted this compound as a VOC. CARB staff has reviewed this compound and determined that the HFO-1234ze compound has negligible impact on ground-level ozone as well as a low GWP, no ozone depleting potential and has been determined to have no adverse health impacts. This compound is nonflammable as well. By CARB exempting this compound, it provides another tool for the industry to use for reformulation.

Honeywell appreciates the opportunity to work with the staff on this issue. Their willingness to meet with our company was extremely helpful.

Any questions or comments feel free to contact our consultant Doug Raymond at 440-474-4999 or diraymond@reg-resources.com. We thank you for your time and consideration to this issue.

Sincerely,

Michael Ferrans General Counsel

Cc: Carla Takemoto, Air Resources Board
Doug Raymond, Raymond Regulatory Resources (3R), LLC